

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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UNITED STATES,  
Plaintiff,

v.

No. 23-20191

DEMETRIUS HALEY,  
Defendant.

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MOTION TO FILE HALEY'S PROPOSED JURY INSTRUCTIONS AND SPECIAL  
VERDICT FORM UNDER SEAL

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Comes now the defendant, Demetrius Haley, by and through his counsel of record, and, pursuant to this court's instructions on filing matters under seal in this case and W.D. Tenn. ECF Policy & Procedure 8.1, moves this court to keep his proposed jury instructions and special verdict form under seal pending trial. In support thereof, Mr. Haley would show:

1. These pleadings are, at this stage, proposals to be ruled upon by the court. The instructions and verdict form will be finalized by the court during the jury charge conference at the close of the proof. Given the pretrial publicity, as evidenced in the juror questionnaires, no proposals submitted by any party should be publicly available pending the court ruling and actually instructing the jury.

WHEREFORE, PREMISES CONSIDERED, Mr. Haley prays that, pursuant to W.D. Tenn. ECF Policy & Procedure 8.1, this court order his questionnaire position remain sealed until this case is tried.

Respectfully submitted,

S/Michael J. Stengel

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Certificate of Service

I hereby certify that I have served a copy of the foregoing Motion to Seal by electronic means, via the Court's electronic filing system, on AUSA's David Pritchard, Libby Rogers, Kathryn Gilbert, and Forrest Christian and counsel for the co-defendants this 19th day of August, 2024.